



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

February 8, 1993

Mr. James Shafer
Northern Division
Naval Facilities Engineering Command
Code 1821/JS
10 Industrial Hwy., Mailstop #82
Lester, PA 19113-2090

Re: Revised Draft Proposed Plan (February 1993) and
Draft Technical Memorandum
Site 8
NAS Brunswick
Brunswick, Maine

Dear Jim:

The United States Environmental Protection Agency (EPA) has reviewed the "Revised Draft Proposed Plan for Site 8, the Perimeter Road Disposal Site" dated February 1993. EPA has also reviewed the "Draft Technical Memorandum, Detailed Evaluation of Alternative 8E: Excavation and Use of Subgrade Material at Sites 1 and 3" dated February 1993. EPA's comments regarding these two documents are presented in Attachments I and II, respectively, which are enclosed with this letter.

If you have any questions regarding the enclosed comments, please contact me at (617)573-5785.

Sincerely,

Meghan F. Cassidy
Remedial Project Manager

Enclosures

cc: Nancy Beardsley/ME DEP
Susan Weddle/BASCE
Beth Walters/ABB
~~Jim Caruthers/NASB~~



ATTACHMENT I

The following comments pertain to the document entitled "Draft Technical Memorandum, Detailed Evaluation of Alternative 8E: Excavation and Use of Subgrade Material at Sites 1 and 3" and dated February 1993. The document was submitted by the Department of the Navy for NAS Brunswick.

1. Page 1, ¶ 2: The first sentence should indicate that the technical memorandum describes the new alternative in addition to presenting the detailed evaluation.
2. Page 2, ¶ 2: The first sentence of this paragraph refers to the "proposed landfill cap at Sites 1 and 3". The text should be revised to indicate that this component of the remedial action has been determined and that the cap is being designed at this point in time.
3. Page 3, **Description**: Backfilling of the excavation should be included as a component of the alternative.
4. Page 4, ¶ 3: The text should discuss the small amount of PAH-contaminated soil at Site 8. The text should also indicate whether TCLP data is available from the surface soil where the PAH contamination is present. This information is necessary to justify whether all of the soil, including the PAH-contaminated soil, can be transported to Sites 1 and 3 or whether the small volume of PAH-contaminated soil will have to be handled in another manner.
5. Page 9: The first sentence on this page indicates that the material to be excavated from Site 8 is nonhazardous. Does this take the PAH-contaminated soil into account?

ATTACHMENT II

The following comments pertain to the document entitled "Draft Revised Proposed Plan for Site 8, the Perimeter Road Disposal Site" dated February 1993. The document was submitted by the Department of the Navy for NAS Brunswick.

1. Page 1, ¶ 1, last sentence: This sentence refers to the Perimeter Road Disposal Area. In order to be consistent with the title of this fact sheet and all previous documents, the area should be referred to as the Perimeter Road Disposal Site.
2. Page 1: The section of the fact sheet that outlines the key components of the preferred alternative should include backfilling of the excavation.
3. Page 2: The first paragraph under the section entitled "The Public's Role in Evaluating Remedial Alternative" should refer to the Technical Memorandum as well as the RI/FFS for further information regarding Site 8.
4. Page 2: Will the Responsiveness Summary include responses to comments made during the first public comment period? EPA recommends that it does.
5. Page 2: The mail code HAN-CAN1 should be added after USEPA in Meghan Cassidy's address.
6. Page 4, Confirmation Sampling, Grading and Seeding: This section should indicate that the area will be backfilled following excavation.
7. Page 6, second line: The proper phrase is "compliance with ARARs", not "compliance to ARARs" as shown in the text.